

Charles D. Cole, Jr.
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Attorneys for Defendants Stevens Transport, Inc.
and Michael E. Argueta

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<u>JESSE EDWARDS, JR.,</u>	:	
	:	
Plaintiff,	:	
	:	
v.	:	No. 2:18-cv-132
	:	
STEVENS TRANSPORT INC., MICHAEL	:	
E. ARGUETA, and JOHN DOE a fictitious	:	
name,	:	
Defendants.	:	
<u></u>	:	

NOTICE OF REMOVAL

Defendants Stevens Transport, Inc., the post-office address of which is Post Office Box 279010, Dallas, Texas 75227, and Michael E. Argueta, whose post-office address is 321 East 4th Street #3, Hialeah, Florida 33010, remove this action, which has been brought by plaintiff Jesse Edwards, Jr, whose post-office address is 93-95 Tillinghast Street, Newark, New Jersey, from the Superior Court of the State of New Jersey, Essex County to the United States District Court for the District of New Jersey.

1. The plaintiff commenced this action against Stevens Transport, Inc. and Michael E. Argueta in the Superior Court of the State of New Jersey, Essex County. A copy of the complaint is attached as **Exhibit A**.

2. The plaintiff is a citizen of the State of New Jersey and was a citizen of the State of New Jersey when this action was started in state court.

a. Jesse Edwards, Jr. is (and was) a citizen of the State of New Jersey.

3. The defendants are citizens of states other than the State of New Jersey and were citizens of states other than the State of New Jersey when this action was started in state court.

a. Stevens Transport, Inc. is (and was) a corporation incorporated in the State of Texas with its principal place in the State of Texas.

b. Michael E. Argueta (and was) a citizen of the State of Florida.

c. John Doe is a fictitious name the citizenship of which is disregarded.
See 28 U.S.C. § 1441(b)(1).

4. The plaintiff seeks damages in excess of \$75,000 exclusive of interest and costs.

5. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started in state court—is between citizens of different states and the amount in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs.

6. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the district courts of the United States have original jurisdiction that is brought in state court.

7. All defendants join in the removal of this action to this court.

Dated: January 4, 2018

A handwritten signature in black ink, appearing to read "Charles D. Cole, Jr.", is positioned above a horizontal line.

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